

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**Caption in Compliance with D.N.J. LBR 9004-2(c)**

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RM-1141

In Re:

TRAVIS D. KIRSCH

Case No. 19-25587 (ABA)

Judge:

Chapter 13

**CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION TO**

**CREDITOR'S MOTION or CERTIFICATION OF DEFAULT**

**X TRUSTEE'S MOTION or CERTIFICATION OF DEFAULT**

The debtors in the above-captioned chapter 13 proceeding hereby object to the following (choose one):

1.  Motion for Relief from the Automatic Stay filed by \_\_\_\_\_, creditor. A hearing has been scheduled for \_\_\_\_\_, at 9 a.m.

OR

Motion to Dismiss filed by the Standing Chapter 13 Trustee. A hearing has been scheduled for \_\_\_\_\_ at \_\_\_\_\_ a.m.

OR

Certification of Default filed by \_\_\_\_\_, creditor. We are requesting that a hearing be scheduled on this matter.

OR

Certification of Default filed by Standing Chapter 13 Trustee. We are requesting that a hearing be scheduled on this matter.

2. We are objecting to the above for the following reasons (**choose one**):

Payments have been made in the amount of \$\_\_\_\_\_, but have not been accounted for. Documentation in support is attached hereto.

Payments have not been made for the following reasons and debtor proposes repayment as follows (**explain your answer**):

X Other: Mr. Kirsch informed me that he wanted to file the following response. However, I did not yet receive his signed response.

I would like to resolve the matter as follows. I will pay \$2,000.00 by 1/10/2023. The balance of the arrears to be capitalized through the balance of my trustee payments. I will submit to a wage order, which deducts the trustee payments directly from my pay. I respectfully request that the court allow me to cure the arrears as stated.

3. This certification is being made in an effort to resolve the issues raised by the creditor in its motion.

4. We certify under penalty of perjury that the foregoing is true and correct.

Date: 12/16/22

/s/Robert Manchel  
Robert Manchel, debtor's attorney